

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEXANDRA POLOS,

Plaintiff,

-v-

PARAMOUNT GLOBAL, ET AL.,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4/7/2025

ORDER

23-CV-8896 (GHW) (HJR)

HENRY J. RICARDO, United States Magistrate Judge.

The Court held a conference on April 4, 2025 to address Defendants' Letter Motion to Compel Production of the Plaintiff's Handwritten Notes, ECF No. 145; Defendants' Letter Motion to Compel Releases from Medical Providers, ECF No. 148; Plaintiff's Letter Motion to Compel Production of Documents Provided to the New York Attorney General, ECF No. 150; Defendants' Letter Motion for a Protective Order Regarding Its 30(b)(6) Witness, ECF No. 151; Plaintiff's Letter Motion to Reopen the Deposition of Renee Balducci, ECF No. 152; and Plaintiff's Letter Motion for a Forensic Exam of the Balducci and Richards Cell Phones and iCloud Accounts. ECF No. 153. For the reasons discussed during the conference, the Court issues the following rulings:

- Defendants' Letter Motion to Compel Production of the Plaintiff's Handwritten Notes, ECF No. 145, is **DENIED**.
- Defendants' Letter Motion to Compel Releases from Medical Providers, ECF No. 148, is **GRANTED IN PART** and **DENIED IN PART**. Plaintiff is

directed to provide a signed release to Dr. Dan Williams for medical records from January 1, 2018 to the present; Plaintiff is directed to provide a signed release to Dr. Nina Williams for any letter sent to Dr. Christine Jackson after January 1, 2018.

- Plaintiff's Letter Motion to Compel Production of Documents Provided to the New York Attorney General, ECF No. 150, is **GRANTED IN PART** and **DENIED IN PART**. Defendants are directed to search the collection of documents produced to the NYAG for documents falling within the existing scope of discovery.
- Defendants' Letter Motion for a Protective Order Regarding Its 30(b)(6) Witness, ECF No. 151, is **GRANTED IN PART** and **DENIED IN PART**, as set forth below, using the numbering of the topics in Plaintiff's 30(b)(6) deposition notice.
 1. Defendants shall provide a 30(b)(6) witness on whether there was any written guidance as referenced in the agreement with the New York Attorney General's Office.
 2. Defendants shall provide a 30(b)(6) witness on whether there were any guidelines, policies, or procedures for investigating complaints as referenced in the agreement with the New York Attorney General's Office.

3. Defendants shall provide a 30(b)(6) witness on whether there was any written policy with regard to employee discipline and corrective actions as referenced in the agreement with the New York Attorney General's Office.

4&5. Defendants shall provide a sworn, written response identifying any training Mr. Owens, Mr. Simon, Ms. Balducci, and Ms. Glasgow received concerning harassment, discrimination, retaliation, and corrective action prior to Plaintiff's termination. If the materials for such training have not been produced, Defendants' response must provide a brief description of the training.

6. Defendants shall provide a 30(b)(6) witness on whether Defendants have provided all complaints against Radutzky, Levine, Croxton and Richman within the relevant timeframe (established in previous discovery disputes) and, if so, a general description of the efforts made to find any such complaints.

7. Defendants shall provide a 30(b)(6) witness on whether the Named Comparators received severance upon their respective terminations and, if so, the material terms of such severance.

8. Defendants shall provide a 30(b)(6) witness on when Plaintiff's company phone was wiped of data, unless they provide a satisfactory sworn affidavit providing such information beforehand.

9. Defendants are directed to provide a sworn affidavit stating whether any *60 Minutes* Senior Producers, Producers, Senior Editors, and Editors who were separated involuntarily for non-economic reasons received severance.

10. The parties are directed to meet and confer regarding a stipulation concerning the foundation for and authenticity of Defendants' Position Statement to the Equal Opportunity Employment Commission.

11. Defendants shall provide a 30(b)(6) witness to describe certain information about the separations of Ms. V. and Ms. G., *i.e.*, the dates of their separations, the general nature of the separations, and the decisionmakers involved, unless they provide a satisfactory sworn affidavit providing such information beforehand.

12. Defendants shall provide a 30(b)(6) witness to identify the *60 Minutes* and *60 Minutes+* employees referenced Exhibit H to Plaintiff's Letter Motion, ECF No. 107 at 153–73, unless they provide a satisfactory sworn affidavit providing such information beforehand.

13. The parties are directed to meet and confer regarding a stipulation concerning the foundation for and authenticity of the agreement between CBS and the New York Attorney General.

- Plaintiff's Letter Motion to Reopen the Deposition of Renee Balducci, ECF No. 152, is **GRANTED**. Plaintiff may question Ms. Balducci regarding the

newly produced recording of Ms. Balducci's conversation with Ms. Richards for up to one additional hour.

- Plaintiff's Letter Motion for a Forensic Exam of the Balducci and Richards Cell Phones and iCloud Accounts, ECF No. 153, was not ruled on and will be addressed in a separate order.

CONCLUSION

For the reasons described during the conference held on April 4, 2025, the Clerk of Court is respectfully directed to terminate the Letter Motion at ECF No. 145 as DENIED, the Letter Motion at ECF No. 152 as GRANTED, and each Letter Motion at ECF Nos. 148, 150 and 151 as GRANTED IN PART and DENIED IN PART.

SO ORDERED.

Dated: April 7, 2025
New York, New York



Henry J. Ricardo
United States Magistrate Judge